

# **South Coast Air Quality Management District**

## **Statement of Basis**

### **Proposed Renewal of Title V Permit**

Issue Date: February 28, 2014

<b>Facility Name:</b>	<b>SFPP, LP</b>
<b>Facility ID:</b>	<b>800279</b>
<b>SIC Code:</b>	<b>4226</b>
<b>Equipment Location:</b>	<b>1350 N. Main Street Orange, CA 92867</b>
<b>Application #(s):</b>	<b>553898</b>
<b>Application Submittal Date(s):</b>	<b>07/02/2013</b>
<b>Revision Date:</b>	<b>DRAFT</b>
<b>Permit Section(s) Affected:</b>	<b>All</b>
<b>AQMD Contact Person:</b>	<b>Linda Dejbakhsh, AQ Engineer</b>
<b>Phone Number:</b>	<b>(909) 396-2614</b>
<b>E-Mail Address:</b>	<b>LDejbakhsh@aqmd.gov</b>

---

#### **1. Introduction and Scope of Permit**

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. CO, NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of SFPP, LP located at 1350 N. Main Street, Orange, California. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an existing facility that is applying for a Title V permit renewal. SFPP, LP owns and operates a petroleum products distribution terminal facility in Orange, CA. It receives petroleum products, such as gasoline and diesel via pipelines from Carson, CA and ethanol via truck. It then transfers the product via loading racks into tanker trucks. This facility consists of loading racks, fixed roof, internal floating roof, and external floating roof storage tanks and a thermal oxidizer to control emissions from the operation of the loading racks. There are also support equipment such as oil-water separators and sumps.

## **3. Construction and Permitting History**

The facility has been in constant operation since 1962. An initial Title V permit was issued to the facility on 1/26/2009. Subsequent revisions include changes to commodity vapor pressure in storage tanks, corrections to equipment wordings, and adding vapor balance to the ethanol unloading rack.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility, and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility, and the permit terms and conditions may be found in Sections D and J of the Title V permit.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. Discussion of the CAM requirements is included in the evaluation of the CAM Plan covered by A/N 555222.

## 6. Permit Features

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)**  
**Annual Reported Emissions for Reporting Period 2012**

Pollutant	Emissions (tons/year)
NO <sub>x</sub>	2.028
CO	3.471
VOC	13.421
PM	0.020
SO <sub>x</sub>	0.003

**Toxic Air Contaminants Emissions (TAC)**  
**Annual Reported Emissions for Reporting Period 2012**

The Following TACs Were Reported	Emissions (lbs/yr)
Benzene	162.305
Ethyl benzene	25.207
Naphthalene	12.516
Ammonia	0.199
Hexane	406.675
Toluene	327.013
Xylenes	125.778

### **Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1999 with the following risk factors:

Cancer Risk	5.85 in one million
Acute Hazard Index	0.00
Chronic Hazard Index	0.24

Based on this level of health risk, a Risk Reduction Plan is not currently required under AQMD Rule 1402, and permit changes are not necessary based solely on currently known health risk levels.

## **8. Compliance History**

As noted, the facility has been in constant operation since 1962. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had 0 citizen complaints filed, 0 Notice to Comply issued, and 0 Notices of Violation issued in the last two calendar years.

## **9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

## **10. Comments**

This TV Renewal includes the following changes:

- Include enhanced monitoring conditions for the 63 mmbtu/hr thermal oxidizer (A/N 482011:P/O G28981 ) to comply with Compliance Assurance Monitoring (CAM). A CAM plan is also approved under A/N 555222.
- Remove rule reference to Rule 1173 from Facility Wide Conditions, since bulk terminals are not subject to this rule.
- Add references to Rules 466, 466.1, 60 CFR 60 Subpart IIII, and 60 CFR 60 Subpart JJJJ to Facility Wide Conditions.
- Update rules in Section K and Appendix B.